



City of Phoenix

OFFICE OF THE CITY MANAGER

November 30, 2005

Mr. Robert W. Johnson
Regional Director
Bureau of Reclamation
Lower Colorado Region, Attention: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006-1470

Re: Notice of intent to prepare an environmental impact statement (EIS) and notice to solicit comments and hold public scoping meetings on the development of Lower Basin shortage guidelines and coordinated management strategies for the Operation of Lake Powell and Lake Mead under low reservoir conditions.

Dear Mr. Johnson,

The City of Phoenix ("City") submits its response to the notice to scope an EIS and solicit public comments on the development of management strategies for Lake Powell and Lake Mead including Lower Basin shortage guidelines under low reservoir conditions (70 Fed. Reg. 57322, dated September 30, 2005) ("Notice"). Colorado River water delivered to Phoenix through the Central Arizona Project ("CAP") is a vital component of the City's water resources portfolio. Over 1.4 million people in the City rely on this resource to supply over 35% of the City's current total water demand. The City holds CAP subcontracts for Municipal and Industrial Priority water, non-Indian agricultural priority water and leases Indian priority water. Thus, the City has a unique perspective upon the opportunities to manage Lake Powell and Lake Mead and on Lower Basin shortage guidelines.

As you are well aware the CAP has a junior priority under the Law of the River. Therefore, the State of Arizona, the CAP, and the City, are the most vulnerable water users in the Lower Basin if shortages are declared by the Secretary of the Interior ("Secretary"). Because Arizona faces the greatest risks, the City urges the Bureau to give great weight to the comments provided by the City, the State of Arizona, the CAP and Arizona water users. Arizona stakeholders, in concert with the Arizona Department of Water Resources, have crafted a set of shortage criteria that consider impacts on various beneficiaries of the Colorado River. Those criteria are presented in detail below.

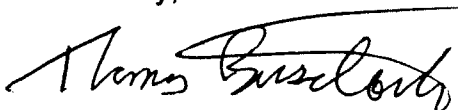
The City requests that the scope of the EIS be broad enough to encompass alternatives that are consistent with the following:

1. The Secretary should not adopt operational schemes that increase the risk of shortage in the Lower Basin that are not consistent with the Law of the River.

2. Water supply has a higher priority than hydropower generation and the determination of equalization under Section 602 (a) of the Colorado River Basin Project Act of 1968 should adhere to that principle. Water users in Phoenix should not be subject to shortages for the benefit of hydropower production. The EIS must analyze potential impacts on CAP water users in Arizona if the reservoirs are operated to elevate power production to an equal or greater priority as consumptive water use.
3. The scope of the EIS should include an analysis of the Bureau's current and planned equalization triggers that include Upper Basin depletion schedules, any temporary limitations on storage levels or elevations, the calculation of active storage in the Upper Basin, and any inherent limitations in the Bureau's current computer model used to simulate reservoir operations.
4. Shortage criteria should be implemented for an interim period. An appropriate time frame is 2016, since, for example, the Interim Surplus Guidelines expire at that time.
5. Mexico and Nevada should share in shortages to the Lower Basin.
6. The City agrees with the Arizona Department of Water Resources recommendation that the EIS should analyze Lower Basin shortages that are implemented in the following manner:
 - a. For Lake Mead elevations between 1075 ft. and 1050 ft. the shortage reduction should be 400,000 AF.
 - b. For Lake Mead elevations between 1050 ft. and 1025 ft. the shortage reduction should be 500,000 AF.
 - c. For Lake Mead elevations beginning at 1025 ft., and below, the shortage reduction should be 600,000 AF.
 - d. Flexibility should be built into implementation of these criteria so that consultation with the State of Arizona can take place so that reductions beyond 600,000 AF will be done in the least damaging way and when improving hydrologic conditions may warrant a lesser reduction than is indicated by a trigger elevation.

The City appreciates the ability to provide comments and will continue to work with the Bureau as final shortage criteria and reservoir management schemes are adopted by the Secretary.

Sincerely,



Thomas Buschatzke
Water Advisor

bcc: Herb Guenther, Ariz Dept of Water Resources ✓
Andrea Tevlin, City of Phoenix